

**CARMAN, CALLAHAN & INGHAM, LLP**

**266 MAIN STREET**

**FARMINGDALE, NEW YORK 11735**

**TEL: (516) 249-3450**

**FAX: (516) 843-6390**

Writer's Direct Dial (516) 370-5522  
www.carmancallahan.com

**MICHAEL F. INGHAM\***  
**GREGORY W. CARMAN, JR.**  
**JAMES M. CARMAN <sup>A</sup>**  
**PETER F. BREHENY**  
**STEPHANIE L. BODEN**  
**PAUL A. BARRETT**  
**WILLIS B. CARMAN**  
**TRACY S. REIFER**  
**JAMI C. AMARASINGHE<sup>C</sup>**  
**HOWARD J. KAPLAN<sup>C</sup>**

**MICHAEL M. BURKART**  
**<sup>B</sup>LAUREN M. MAZZARA**  
**ANNE P. O'BRIEN**  
**JONATHAN D. SILVERSTEIN**  
**<sup>B</sup>ARI N. RUBEL**  
**JOHN P. CAPITANI**  
**AYANNAH J. CASIMIR**  
**APOSTOLOS M. PLOKAMAKIS**  
**TABITHA BURNETT**  
**MARYSA LINARES**


January 30, 2020

**HON. WILLIS B. CARMAN, SR.**  
**FIRM'S FOUNDER (1928-1985)**

**\* ALSO ADMITTED IN FL**  
**<sup>A</sup> ALSO ADMITTED IN PA**  
**<sup>C</sup> ALSO ADMITTED IN NJ**

**Filed by ECF**

Hon. Vernon S. Broderick  
U.S. District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**APPLICATION GRANTED**  
**SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J. 1/31/2020**

Re: Quirindongo v. Lara & DKA  
USDC-SDNY: CV 19 3910

The post discovery status conference scheduled for  
January 31, 2020 is hereby adjourned to April 2, 2020 at  
11:00 a.m.

Honorable Judge Broderick:

Our office represents the Defendants Yefry Moreta-Lara and DKA Logistics in connection with the above referenced matter.

As the Court is aware, all discovery, all discovery was to be completed by January 15, 2020. However, due to scheduling issues, the parties have not been able to complete the physical examination of the Plaintiff, which is currently scheduled for February 7, 2020.


I write this letter to respectfully request a sixty (60) day extension to complete additional expert discovery, including deposition of any experts.

The retention of this expert is critical to the defense of this claim. Accordingly, Defendant requests the deadline to complete all discovery be extended to March 30, 2020.

I have spoken with counsel for the Plaintiff, Michael Huguenot, who has agreed to this adjournment.

Thank you in advance.

Very truly yours,  
Carman, Callahan & Ingham, LLP

  
Tracy S. Reifer  
(TSR 8927)

TSR/js

cc: Via Fax-718-654-1374  
Voza & Huguenot, Esqs.